



EPSTEIN DRANGEL LLP

60 East 42nd Street, Suite 1250, New York, NY 10165
 T: 212.292.5390 • E: mail@ipcounselors.com
www.ipcounselors.com

Denise L.
Denise L.
 3/12/25

March 12, 2025

VIA ECF

Hon. Denise L. Cote
 United States District Judge
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street
 New York, New York 10007

Re: *Intelligent Change, LLC v. ABNMCA, et al.*
Case No. 24-cv-8501 (DLC)
Second Request for Extension of Time to File Default Judgment
Motion Against Unknown Address Defendants

Dear Judge Cote,

We represent Plaintiff Intelligent Change, LLC (“Plaintiff”), in the above-referenced action (the “Action”).¹ On December 18, 2024, the Court issued an Order stating, *inter alia*, that if any of the Unknown Address Defendants² are in default, Plaintiff shall file a Motion for Default Judgment by no later than January 17, 2025. (Dkt. 32). On January 13, 2025, Plaintiff wrote a letter to the Court requesting, *inter alia*, an extension of time to file its motion for default judgment against the Unknown Address Defendants. (Dkt. 38). On January 14, 2025, the Court granted Plaintiff’s request, directing Plaintiff to file its motion for default judgment against the Unknown Address Defendants by no later than March 14, 2025 and adjourning the default judgment hearing from February 7, 2025 at 2:30 p.m. to April 4, 2025 at 2:30 p.m. (Dkt. 44). On February 27, 2025, the Court entered an Order directing Plaintiff to file any motion for default judgment against Defendant JIANPO Co. Ltd by no later than March 14, 2025 (“February 27, 2025 Order”). (Dkt. 53).

Presently, only one (1) of the Unknown Address Defendants, qiqimaoyi, remains in this Action. As a result, Plaintiff would only be filing its motion for default judgment against Unknown Address Defendant qiqimaoyi and Defendant JIANPO Co. Ltd per the Court’s February 27, 2025 Order as Plaintiff is awaiting service via the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (the “Hague”) on the remaining eight (8) Defendants in the

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaint or Application.

² Defendants Cheercome, Koogel Store, Bdday, Beautiful clothing, bmange, GBAYXJ HOME, Haixi Store Co., Ltd., KAGAYD Co. Ltd, qiqimaoyi, Viwoeim, XINDISNusfo and YMJQL. The following Unknown Address Defendants have since been voluntarily dismissed from the Action: Cheercome, Koogel Store, Bdday, Beautiful clothing, bmange, GBAYXJ HOME, Haixi Store Co., Ltd., KAGAYD Co. Ltd, Viwoeim, XINDISNusfo and YMJQL.

Hon. Denise L. Cote

March 12, 2025

Page 2 of 2

Action³ (the “Hague Defendants”). Accordingly, so as not to waste the Court’s time and resources on multiple identical motions for default judgment, Plaintiff respectfully requests a second extension of time to file its motion for default judgment against Unknown Address Defendant qiqimaoyi and Defendant JIANPO Co. Ltd until it receives the Hague service results for the Hague Defendants. In addition, Plaintiff respectfully proposes updating the Court with respect to Hague service every sixty (60) days until all Defendants in the Action have been served at which time Plaintiff will move for default judgment.

In accordance with Your Honor’s Individual Practices, Plaintiff respectfully submits the following:

1. **The original due date:** Plaintiff’s deadline to file its motion for default judgment against Unknown Address Defendant qiqimaoyi and Defendant JIANPO Co. Ltd is March 14, 2025.
2. **The number of previous requests for adjournment or extensions of time:** This is Plaintiff’s second request for an extension of time to file its motion for default judgment against the Unknown Address Defendant qiqimaoyi and its first request for an extension of time to file its default judgment motion against Defendant JIANPO Co. Ltd.
3. **Whether these previous requests were granted or denied:** Plaintiff’s first request for an extension of time to file its motion for default judgment against the Unknown Address Defendants was granted. (Dkt. 44).
4. **Whether the adversary consents, and, if not, the reasons given by the adversary for refusing to consent:** Unknown Address Defendant qiqimaoyi is currently in default, thus Plaintiff did not seek qiqimaoyi’s consent. Previously, counsel for Defendant JIANPO Co. Ltd advised Plaintiff’s counsel that it does not intend to defend itself in this Action, and on March 12, 2025, counsel for JIANPO Co. Ltd again confirmed that it does not wish to defend itself or otherwise appear in this Action.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Gabriela N. Nastasi
 Gabriela N. Nastasi
gnastasi@ipcounselors.com
 60 East 42nd Street, Suite 1250
 New York, NY 10165
 Telephone: (212) 292-5390
 Facsimile: (212) 292-5391
Attorneys for Plaintiff

³ Plaintiff is currently in the process of serving the following eight (8) Defendants through the Hague: bnGAJN, FANX, IKDXUF, JiaChangwang Co., LTD, NIHOND, Tantou Home Supply, TFHENGQQ and wuxinga.